

### REMARKS

The above amendments to the above-captioned application along with the following remarks are being submitted as a full and complete response to the Office Action dated November 23, 2007. In view of the above amendments and the following remarks, the Examiner is respectfully requested to give due reconsideration to this application, to indicate the allowability of the claims, and to pass this case to issue.

#### Status of the Claims

As outlined above, claims 1-3, 6-8, 10-11, and 13-19 stand for consideration in this application, wherein claims 4, 5, 9, and 12 are being canceled without prejudice or disclaimer, while claims 1, 6, 8, 10, 15, 17, and 18 are being amended.

All amendments to the application are fully supported therein. Applicants hereby submit that no new matter is being introduced into the application through the submission of this response.

#### Formal Rejection

Claim 1 was rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention.

As set forth above, claim 1 is being amended so as to specify from where the request is received. However, Applicants respectfully disagree with the Examiner's assertion that Applicants failed to state the function or purpose of the algorithms recited in claim 1. Claim 1 clearly recites "traffic control algorithms". One of ordinary skill in the art would understand that the function or purpose of the "traffic control algorithms" in a traffic control computing device as recited in claim 1 is to control traffic in a network. Therefore, Applicants respectfully submit that claim 1 meets the requirement under 35 U.S.C. §112, second paragraph, with respect to the term "traffic control algorithms" as recited in claim 1.

Accordingly, withdrawal of the rejection of claim 1 is respectfully requested.

#### Prior Art Rejections

##### 35 U.S.C. §102(b) Rejection

Each of claims 1-19 was rejected under 35 U.S.C. §102(b) as being anticipated by Neuman et al. (U.S. Publication No. 2002/0162026). As mentioned above, claims 4, 5, 9, and

12 are being cancelled. Applicants respectfully traverse the rejections against claims 1-3, 6-8, 10-11, and 13-19 for the reasons set forth below.

According to the M.P.E.P. §2131, a claim is anticipated under 35 U.S.C. §102 (a), (b), and (e) only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.

#### Claim 1

Claim 1 as amended recites that a traffic control computing device comprises: a traffic control interface to connect to traffic control devices which control traffic in a network; a traffic control request interface to connect to traffic control request detecting devices which determine whether a traffic control must be executed by said traffic control devices; a first storage device in which information about traffic control received via the traffic control request interface is stored; a traffic control computing unit connected to said traffic control interface, and connected to said traffic control request interface, and connected to said first storage device; and a traffic control computing management interface, wherein said traffic control computing unit computes traffic control algorithms based on traffic control requests received from said traffic control request detecting devices and stored in the first storage device and sends the traffic control algorithms to said traffic control interface, wherein said traffic control computing unit compares a sender of a traffic control request received through said traffic control request interface for a match with any of traffic control information objects stored in said first storage device and rejects said traffic control request if said sender of the received request is not stored in said first storage device, and wherein said traffic control computing management interface is configured to operate as a contact point for communicating with a network administrator and said traffic control computing unit checks whether a traffic control request that conflicts with said traffic control request received is included in said first storage device and, if a conflicting traffic control request is included, compares a sender of the conflicting traffic control request with the sender of said traffic control request received, and, if both the senders are different, sends a notification of the conflicting requests to said traffic control computing management interface.

A traffic control computing device as recited in claim 1, is configured to determine whether there is a conflict among traffic control requests. More precisely, a sender of said traffic control request is compared with a sender of a traffic control request received through said traffic control request interface. If both the senders are different, a notification of the

conflicting requests is sent to a traffic control computing management interface. Where a network includes a plurality of traffic control devices, control requests from the traffic control devices may conflict with each other. However, the above-mentioned features enables coordination of such traffic control requests, and thus, the whole network control equipment can operate consistently without being affected by the conflict among the traffic request. (See page 9, line 1-14 of the specification)

In contrast, Newman merely states that a network administrator can specify policies, update agents, patch vulnerabilities, track usage, and manage users all from a central managing server, and that a cache of servlets, are regularly checked against the master repository on the central management console (paragraphs [0089], [0093]). In other words, Neuman merely shows or suggests that servlets, which is a Java application capable of handling HTTP requests, are compared with the master repository. This means that the network management server maintains a universal policy. However, Neuman does not show or suggest determining whether there is a conflict among traffic control requests. Therefore, Neuman cannot and does not show or suggest either explicitly or implicitly comparing a sender of a traffic control request with a sender of a traffic control request received through a traffic control request interface, and if both the senders are different, sending a notification of the conflicting requests to a traffic control computing management interface.

Therefore, Neuman does not show every element recited in claim 1. Accordingly, claim 1 is not anticipated by Neuman.

#### Claims 10, 17, 18

Claims 10, 17, and 18 has substantially the same features as those of claim 1, at least with respect to comparing a sender of said traffic control request is with a sender of a traffic control request received through said traffic control request interface and if both the senders are different, notifying that the conflict exists. As such, the arguments set forth above are equally applicable here. Claim 1 being allowable, claims 10, 17, and 18 must also be allowable.

#### Claims 2-3, 6-8, 11, 13-16, 19

As to dependent claims 2-3, 6-8, 11, 13-16, and 19, the arguments set forth above with respect to independent claims 1, 10, 17, and 18 are equally applicable here. The

corresponding base claim being allowable, claims 2-3, 6-8, 11, 13-16, and 19 must also be allowable.

35 U.S.C. §103(a) Rejection

Claim 9 was rejected under 35 U.S.C. §103(a) as being allegedly unpatentable over Neuman in view of Minear et al. (U.S. Patent No. 5,983,350).

As mentioned above, claim 9 is being canceled, and therefore, this rejection is moot. Accordingly, withdrawal of the rejection of claim 9 is respectfully requested.

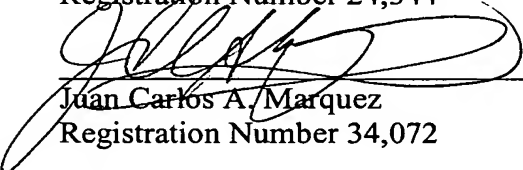
Conclusion

In light of the Amendments and Remarks, Applicants respectfully request early and favorable action with regard to the present application, and a Notice of Allowance for all pending claims is earnestly solicited.

Favorable reconsideration of this application as amended is respectfully solicited. Should there be any outstanding issues requiring discussion that would further the prosecution and allowance of the above-captioned application, the Examiner is invited to contact the Applicants' undersigned representative at the address and phone number indicated below.

Respectfully submitted,

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